

Cullin O'Brien <cullin@cullinobrienlaw.com>

7/25/2016 7:50 PM

RE: Wilding v. DNC, U.S.D.C. S.D. Fla., Case No. 16-CV-1511 - Meet and Confer on Anticipated Motion to Disqualify Perkins Coie, LLP as defense counsel in the case

To Elisabeth C. (Perkins Coie) Frost <efrost@perkinscoie.com> •
Elizabeth Lee Beck <elizabeth@beckandlee.com> Copy Jared H. Beck <jared@beckandlee.com> •
hern8491@bellsouth.net • Marc (Perkins Coie) Elias <melias@perkinscoie.com> •
Graham M. (Perkins Coie) Wilson <gwilson@perkinscoie.com>

Counsel,

Please find attached the three exhibits that correspond with the email below.

Please advise.

Regards,

Cullin

From: Cullin O'Brien [mailto:cullin@cullinobrienlaw.com]

Sent: Monday, July 25, 2016 7:43 PM

To:

Cc:

Subject: Wilding v. DNC, U.S.D.C. S.D. Fla., Case No. 16-CV-1511 - Meet and Confer on Anticipated Motion to Disqualify Perkins Coie, LLP as defense counsel in the case

Importance: High

Counsel,

Pursuant to S.D. Fla. L.R. 7.1(a)(3), we write to meet and confer regarding plaintiffs' anticipated motion to disqualify Perkins Coie LLP ("Perkins Coie") as defense counsel in this case.

It has come to our attention that Perkins Coie appears to be a potential material witness and/or defendant in this case and, moreover, appears to have a potential disqualifying conflict of interest. See <https://wikileaks.org/dnc-emails/emailid/5740> (email from Perkins Coie attorney stating, *inter alia*, "the DNC should push back DIRECTLY at Sanders and say that what he is saying is false and harmful the . . . Democratic party"), attached hereto as Exhibit A; <https://wikileaks.org/dnc-emails/emailid/20148> (email from Perkins Coie attorney stating, *inter alia*, "Tina Tchen is an Assistant to POTUS and Chief of Staff to FLOTUS, thereby triggering the Hatch Act. We cannot include Executive Branch employees on an event invite that contains solicitation."), attached hereto as Exhibit B; <https://www.washingtonpost.com/news/the-fix/wp/2016/07/24/here-are-the-latest-most-damaging-things-in-the-dncs-leaked-emails/> (noting Perkins Coie attorney as "A Clinton Lawyer gives DNC strategy advice on Sanders"), attached hereto as Exhibit C.

When are you or Perkins Coie's counsel (if any) available to confer? Please advise.

Regards,

Cullin

- Exhibit B to Meet and Confer.pdf (224 KB)
- Exhibit A to Meet and Confer.pdf (352 KB)
- Exhibit C to Meet and Confer.pdf (340 KB)